BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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CLASSIFICATION AND FEES
FOR CONFIRM®

Docket No. MC2002-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS JOE LUBENOW
(APWU/USPS-T2-1-2)
(May 31, 2002)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal
Rate Commission, the American Postal Workers Union, AFL-CIO ("APWU")
hereby submits interrogatories and requests for production of documents to
USPS Witness Joe Lubenow.

Respectfully submitted,

Susan L. Catler
O'Donnell, Schwartz and Anderson, P.C.
1300 L Street NW Suite 1200
Washington, DC 20005-4126
Telephone: (202) 898-1707
Facsimile: (202) 862-9276
e-mail: scatler@odsalaw.com

Counsel for American Postal Workers Union, AFL-CIO

CERTIFICATION

I hereby certify that I have this date served the following document in
accordance with the rules of practice.

Susan L. Catler
O'Donnell, Schwartz and Anderson, P.C.
1300 L Street NW Suite 1200
Washington, DC 20005-4126

May 31, 2002

APWU/USPS-T-1. On page 8 of your testimony, at lines 10 through 14, you discuss how CONFIRM data can be used "to accumulate data on how quickly mail flows from point to point throughout the system" and state that a "matrix could fairly easily be developed allowing internal comparisons and determination of relative efficiencies and where bottlenecks are occurring." Has the CONFIRM data been used in any of these ways to date? If so, please provide examples. Which Postal personnel have had or will have access to CONFIRM data for these purposes? Has anyone been tasked with reviewing CONFIRM data to look for bottlenecks? If so, who has been tasked to look for bottlenecks, have any bottlenecks been located as a result of reviewing CONFIRM data and have any bottlenecks been removed as a result of reviewing CONFIRM data?   If so, please provide examples.

APWU/USPS-T2-2. On page 8 of your testimony, at lines 15 through 22, you discuss how CONFIRM data can be used to resolve customer service problems with a particular CONFIRM mailer. Has the CONFIRM data been used in any of these ways to date? If so, please provide examples. Which Postal personnel have had or will have access to CONFIRM data for these purposes? Have Postal Service customer service representatives had access to CONFIRM data for these purposes? Will they have access to CONFIRM data for these purposes in the future? What training has been or will be provided to customer service representatives or other postal employees on how to use CONFIRM data to resolve customer service problems?